

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

PAMELA RAMOS,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.:
)	07-cv-293-MHT
STATE OF ALABAMA, et al.)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF DEADLINES FOR MOTION FOR CLASS
CERTIFICATION AND TO AMEND PLEADINGS AND ADD PARTIES**

COMES NOW the plaintiff, Pamela Ramos, and moves this Honorable Court to extend the deadline to file a motion for class certification and the deadlines to amend pleadings and add parties.

In support of this motion, the parties state as follows:

1. The Court's Uniform Scheduling Order dated April 3, 2007, set the deadline to file any motion for class certification for June 1, 2007 and the deadline to amend pleadings and add parties for June 1, 2007.
2. This cause was originally filed as a complaint in intervention in *Crum v. State of Alabama*, CV 94-T-356 in 1995 and contained class allegations. A motion for class certification is pending in that lawsuit.
3. The Court recently converted the complaint in intervention into a separate lawsuit.
4. Counsel for the partes have reached an agreement as to this and the other "spin-off" cases which they believe will provide for a more orderly process and potentially avoid unnecessary pleadings. The parties have agreed that the motion to amend pleadings deadline, if any, and the motion for class certification motions, if any, should be made concurrent with the deadline to file

plaintiffs' expert report. In the instant case, plaintiffs' report is due on November 15, 2007 and the discovery cut-off is May 8, 2008.

5. Counsel for the defendants do not oppose and support this motion.

Wherefore, premises considered, plaintiff respectfully requests that the above deadlines in this case be moved to November 15, 2007.

Respectfully submitted,

s/ Russell W. Adams
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Rocco Calamusa, Jr.
Russell W. Adams
Attorneys for the Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this the 9th day of August, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Alice Ann Byrne
State Personnel Department
64 North Union Street
Montgomery, AL 36104

s/ Russell W. Adams
OF COUNSEL